

MITCHELL PRONER (NY, CT, PA, MI, MO)  
TOBI R. SALOTTOLO (NY)  
VANESSA ANGELES (NY)

PRONER



ATTORNEYS AT LAW

1 - 8 0 0 - 3 2 1 - 1 2 3 4

PRONER



MEMO ENDORSED

122 EAST 42<sup>ND</sup>  
STREET  
SUITE 2015  
NEW YORK, NY 10168  
TEL: 212.986.3030  
FAX: 917.633.4393

[WWW.PROLAW1.COM](http://WWW.PROLAW1.COM)

OF COUNSEL

TIMOTHY M. SCHAFER (CT, NY)  
MARISA F. SCHAFER (CT, NY)  
JONATHAN R. KLEE (NY, NJ)  
ANDREW B. WOOLF (NY, FL, NJ)

July 19, 2022

Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street, Chambers 533  
White Plains, NY 10601

**RE:** *Ramirez v. Benitez Leyva*, 7:22-cv-03446

Dear Judge Karas:

Pursuant to the Honorable Judge Karas' individual rules, we respectfully submit this letter-motion petitioning the court for an adjournment of the initial conference, scheduled on July 28, 2022. This office has not requested any prior extensions or adjournments from this court. Opposing counsel has consented to a two-week adjournment of the initial conference over a telephone conversation. This adjournment is being requested because I will be travelling outside of the country on the date of this conference on a family trip.

Plaintiff respectfully request that the court grant our request to adjourn the initial conference by two weeks.

Granted. The conference is adjourned to 9/16/22,  
at 10:00 Safe travels.

So Ordered.

7/19/22

Respectfully submitted

Mitchell Proner

cc (by Email): Francis J. Leddy, III—[Fleddy@c-wlaw.com](mailto:Fleddy@c-wlaw.com); &  
Charles R. Isaacs—[Gwright@c-wlaw.com](mailto:Gwright@c-wlaw.com)  
Cipriani & Werner  
485 Rt. 1 South  
Iselin, NJ 08830